

LAW OFFICES OF

Aidala, Bertuna & Kamins, P.C.

ARTHUR L. AIDALA
MARIANNE E. BERTUNA
HON. BARRY KAMINS (RET.)
HON. JOHN LEVENTHAL (RET.)
JOHN S. ESPOSITO
MICHAEL T. JACCARINO
IMRAN H. ANSARI
DIANA FABI SAMSON
ANDREA M. ARRIGO
MICHAEL DIBENEDETTO
TAYLOR FRIEDMAN

546 FIFTH AVENUE
NEW YORK, NY 10036
TELEPHONE: (212) 486-0011
FACSIMILE: (212) 750-8297
WWW.AIDALALAW.COM

8118 - 13TH AVENUE
BROOKLYN, NEW YORK 11228
TEL: (718) 238-9898
FAX: (718) 921-3292

OF COUNSEL
JOSEPH A. BARATTA
ANTOINETTE LANTERI
WILLIAM R. SANTO
PETER S. THOMAS
LAWRENCE SPASOJEVICH

SENIOR COUNSEL
LOUIS R. AIDALA
JOSEPH P. BARATTA

September 30, 2021

VIA ECF

Hon. Victor Marrero
U.S. District Court for the Southern District of
New York
Daniel Patrick Moynihan United
States Courthouse
500 Pearl Street
New York, New York 10007

Re: Nwosuocha v. Glover II et al., No. 1:21-cv-04047-VM

Dear Judge Marrero:

The undersigned counsel to Plaintiff, Emelike Nwosuocha (“Nwosuocha”), herein writes the Court to request a discretionary enlargement of time to serve the Complaint in this matter upon the Defendants Jefferey Lamar Williams and RCA Records. This request is for good cause pursuant to Rule 4(m) of the Federal Rules of Civil Procedure (“Rule 4(m)”).

This Court issued an August 2, 2021 Order granting Plaintiff’s Motion for an Extension of Time by sixty (60) days. *Doc. No. 8*. Plaintiff respectfully requests this Court to grant an additional sixty (60) day enlargement of this period, *so as to serve two remaining Defendants*, placing the deadline to serve the Complaint on the two outstanding Defendants on November 29, 2021.

While the other Defendants have been served, we have not been able to serve Defendant Jeffrey Lamar Williams, who is a well-known music artist, and whose location

is not easily discernable due to his desire for privacy and routine travel. We are working diligently to obtain the appropriate location at which to properly serve Mr. Williams. Additionally, we have recently been informed that there was a discrepancy in service of “RCA Records” as the General Electric Company (“General”) receives service for an entity with the same name. General does not accept service for the current RCA Records entity who is a named Defendant in this matter. We are contacting the appropriate office to obtain proper instructions for service.

As such, Nwosuocha respectfully requests that the Court grant an enlargement of the time for service of the Complaint on the two outstanding Defendants to November 29, 2021, for good cause under Rule 4(m).

Respectfully submitted,

AIDALA, BERTUNA & KAMINS, P.C.

By: /s/ Imran H. Ansari
Imran H. Ansari, Esq.
546 Fifth Avenue, 6th Floor
New York, NY 10036
T: (212) 486-0011
F: (212) 750-8297
iansari@aidalalaw.com